

EDMUND G. BROWN JR.
GOVERNORMATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION**Los Angeles Regional Water Quality Control Board**

September 23, 2014

Mr. Jeff Stanek
ITT Corporation
1054 North Tustin Avenue
Anaheim, California 92807

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7008 0150 0003 7881 0435

**SUBJECT: CONDITIONAL APPROVAL OF THE SUBSURFACE INVESTIGATION WORKPLAN, PURSUANT
TO CALIFORNIA WATER CODE SECTION 13304 CLEANUP AND ABATEMENT ORDER NO.
R4-2003-0128R**

**SITE: FORMER ITT INDUSTRIES/GENERAL CONTROLS FACILITY, 1200 SOUTH FLOWER STREET,
BURBANK, CALIFORNIA (FILE NO. 109.0582)**

Dear Mr. Stanek:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff have reviewed the *Revised Additional Off-Site Upgradient Groundwater Investigation Workplan* (Report) dated July 11, 2013, submitted by Environ International Corporation (Environ) on behalf of ITT Corporation (ITT), for the referenced site. The Report was voluntarily submitted by ITT and was not required by the Regional Board under the general compliance with the Regional Board's California Water Code (CWC) Section 13304 Cleanup and Abatement Order (CAO) No. R4-2003-0128R dated February 23, 2007.

COMMENTS AND REQUIREMENTS

The Report was reviewed by Regional Board staff and a formal response letter was submitted to ITT on September 19, 2013. The Regional Board staff were concerned that the implementation of the Report's proposed scope of work (SOW) create a increased potential and significant risk of further degradation to the regional groundwater aquifer. This concern was based on an evaluation of the proposed drilling activities to be used for the installation of the groundwater monitoring wells. ITT submitted a response letter dated October 24, 2013, which outlined revised drilling protocols, sampling methods, and quality assurance measures that would be used to reduce the risk of degrading the regional groundwater. Furthermore, the letter suggested that a meeting be conducted between ITT and the Regional Board. On July 9, 2014 a meeting was conducted between, ITT and Regional Board staff and the Regional Board staff agreed to provide a response letter summarizing the actions that were agreed to at the meeting.

SUMMARY OF MEETING ACTIONS AND REPORT

The scope of work (SOW) in the Report dated July 11, 2013 and summarized in the October 24, 2013 letter is as follows:

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

1. Prior to initiating field work, a review of the geologic logs for borings located in proximity to the planned drilling area will be reviewed to estimate the depth and elevation of the top and thickness of the fine grained stratigraphic unit (FGSU);
2. The collection of approximately 20 grab groundwater samples from the shallow zone, defined as the groundwater located above the (FGSU);
3. Sampling protocols will ensure that the FGSU is not compromised in the area of the investigation;
4. Prior to implementing the investigation, steps will be used to focus on obtaining a detailed understanding of the subsurface lithology including the location and configuration of the FGSU. This information will be gathered by either using cone penetrometer testing (CPT) and/or continuous soil sampling. These techniques will provide "real time" identification of the FGSU in the field;"
5. Because the CPT produces a continuous record of soil lithology, the recorded lithology will be reviewed as it is produced at the locations where CPT, stem augers, or direct push drilling techniques are used. The soil will be continuously sampled beginning at approximately 10-feet above the anticipated top surface of the FGSU and then the soil cores will be reviewed foot-by-foot within approximately 5-feet of the anticipated top of the FGSU to ensure the identification of the top of the FGSU. If or when the FGSU is encountered, proper controls will be employed to assure that the FGSU is not compromised and there is no migration of compounds of concern (COCs) through the FGSU to the underlying regional groundwater;
6. Drilling will be terminated within the top 2-feet of the FGSU, further ensuring that the FGSU will not be compromised. Once sampling has concluded, each borehole will be sealed by pumping a bentonite slurry or cement-bentonite mixture through a tremie pipe to the total borehole depth.

As previously stated ITT proposes to advance approximately twenty (20) soil borings in the railroad right-of-way north of East Alameda Street to evaluate subsurface soil lithology and obtain grab groundwater samples above the FGSU. The groundwater samples will be analyzed for volatile organic compounds (VOCs), 1,4-Dioxane, Title 22 Metals, hexavalent chromium, and total organic carbons.

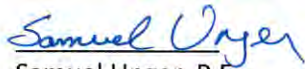
REGIONAL BOARD COMMENTS

The Report is not required to be implemented under a Regional Board 13267 Order nor by a requirement of CAO No. R4-2003-0128R dated February 23, 2007. Based on a review of the Report the Regional Board concurs with the revised SOW and proposed drilling, sampling, and quality assurance measures presented in the Report. Based on the Regional Board's understanding, ITT can implement the Report upon receipt of this letter. The Regional Board does require and expect ITT to implement the proposed SOW as described in the Report. The Regional Board understands that ITT will assume all liability in the event the FGSU is compromised during the implementation of the Report.

Once the Report is completed, a final report will be submitted to the Regional Board 60 calendar days after the completion of field work.

If you have any questions, please contact Mr. Larry Moore, Project Manager, at (213) 576-6730 or email at Lawrence.Moore@waterboards.ca.gov.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Cc: Ms. Lisa Hanusiak, USEPA Region 9
Mr. Leo Chan, City of Glendale
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power
Mr. Jonthan Leung, Los Angeles Department of Water & Power
Mr. Richard Slade, ULARA Watermaster
Ms. Carol Serlin, Environ
Mr. Jeff Raumin, Environ
Mr. Bruce Amig, Goodrich Corp.
Mr. Chris Liban, MTA